



Federal Communications Commission
Washington, D.C. 20554

July 25, 2016

VIA ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W., Room TW-B204
Washington, DC 20554

RE: ***Ex Parte* Notification SAS / ESC Proposals Presentation**
GN Docket No. 15-319, 3.5 GHz SAS and ESC Proposals

Dear Ms. Dortch:

On July 18, 2016, Federal Communications Commission (Commission) staff, in conjunction with personnel from the National Telecommunications and Information Administration (NTIA), the Department of Defense (DoD), and the United States Navy (Navy), made a presentation to prospective Spectrum Access System (SAS) Administrators and Environmental Sensing Capability (ESC) operators. The presentation focused on certain subjects in the SAS and ESC proposals where most, if not all, applicants will need to provide additional information as part of the Commission's review process.¹ This letter serves as notice that this presentation took place and to enter the presentation into the record.

Below are the Commission staff who attended the presentation:

- Brian Regan, Associate Bureau Chief, Office of the Bureau Chief, Wireless Telecommunications Bureau (WTB)
- Paul Powell, Assistant Division Chief, Mobility Division, WTB
- Becky Schwartz, Attorney Advisor, Mobility Division, WTB
- Kamran Etemad, Senior Engineer, Mobility Division, WTB
- Joyce Jones, Attorney Advisor, Mobility Division, WTB
- Heather Moelter, Attorney Advisor, Mobility Division, WTB
- Timothy Saviola, Legal Intern, Mobility Division, WTB
- Julius Knapp, Chief Engineer, Office of Engineering and Technology (OET)
- Ira Keltz, Deputy Chief, Office of the Chief Engineer, OET
- Navid Golshahi, Senior Electronics Engineer, Policy and Rules Division, OET
- Robert Pavlak, Senior Engineer, Electromagnetic Compatibility Division, OET
- Irena Stevens, Engineering Intern, Electromagnetic Compatibility Division, OET

¹ See *Wireless Telecommunications Bureau and Office of Technology Establish Procedure and Deadline for Filing Spectrum Access System (SAS) Administrator(s) and Environmental Sensing Capability (ESC) Operator(s) Applications*, Public Notice, 30 FCC Rcd 14170, 14170-71 (WTB/OET 2016) (proposals submitted by April 15, 2016, to operate SAS and ESC systems are currently being considered for conditional approval based on the satisfaction of all applicable requirements); see also *Amendment of the Commission's Rules with Regard to Commercial Operations in the 3550-3650 MHz Band*, Report and Order and Second Further Notice of Proposed Rulemaking, 30 FCC Rcd 3959, 4070-4071, para. 386 (2015) (both SASs and ESCs are subject to the same approval process, although the evaluation of SASs and ESCs will take place separately).

Below are the representatives of other federal agencies who attended the presentation:

- Thomas Taylor, DoD
- Robert Schneider, DoD
- Ed Drocella, NTIA
- Bob Sole, NTIA (via teleconference)
- Commander Daryk Zirkle, Navy
- Michael Souryal, National Institute of Standards and Technology

Below are the representatives of prospective SAS Administrators and ESC operators who attended the presentation:

- Parag Shah, Amdocs
- Karpura Suryadevara, Amdocs
- Caressa D. Bennet, Bennet & Bennet, Counsel for Amdocs
- Laura Fontaine, Comsearch
- Mark Gibson, Comsearch
- Ariful Hannan, Comsearch
- David Primmer, CTIA
- Scott Bergmann, CTIA
- Kara Romagnino, CTIA
- Paul Anuszkiewicz, CTIA
- Sam MacMullan, Federated Wireless
- Masoud Olfat, Federated Wireless
- Kurt Schaubach, Federated Wireless
- Greg Billock, Google
- Andrew Clegg, Google
- Richard Lee, iPosi
- Gustavo Pavon, iPosi
- Christopher Kurby, iPosi
- Eric Derbez, iPosi (via teleconference)
- Jesse Caulfield, Key Bridge
- Taj Manku, Key Bridge (via teleconference)
- Nirajan Rajkarnikar, Key Bridge (via teleconference)
- Dean Brenner, Qualcomm (on behalf of CTIA, via teleconference)
- Doug Knisely, Qualcomm (on behalf of CTIA, via teleconference)
- Naotaka Sato, Sony
- Jim Morgan, Sony

Commission staff discussed the following topics related to the SAS and ESC applications:

- Propagation model specifications;
- Descriptions of how the SAS ensures compliance with our security rules following software changes;
- Descriptions of the procedures the SAS will follow to protect federal incumbents and FSS earth stations;

- Additional information on how the SAS ensures compliance with our secondary market requirements;²
- An affirmative acknowledgement that the SAS will comply with current and future international agreements in coordinating operations in the 3550-3700 MHz band;
- Descriptions of how the SAS–ESC interface will operate and how it can be tested;
- Additional information on ESC compliance with operational security requirements;
- Additional information on ESC hardware operation; and
- Descriptions of how an SAS will maintain information and exchange information with another SAS.

We encouraged all prospective SAS Administrators and ESC operators to continue to work together and to maintain an open dialogue between themselves and with the Commission as these solutions are developed. We also informed potential SAS Administrators and ESC operators that letters requesting additional information from individual applicants would be sent at a later date.

We remind any prospective SAS Administrators and ESC operators that any amendments or supplements to their proposals must be filed in GN Docket 15-319. We also note that our previous guidance regarding *ex parte* presentations and inter-agency confidentiality procedures remains in effect.³

Pursuant to Section 1.1206(b) of the Commission’s rules, this summary of the Commission’s presentation and slide deck of the presentation itself are being electronically filed in the above-referenced docket.⁴

Respectfully submitted,

/s/

Becky Schwartz
Attorney Advisor, Wireless Telecommunications Bureau

Attachment – Presentation

² This only applies to proposals where the SAS will offer leasing services once approved.

³ *Wireless Telecommunications Bureau and Office of Engineering and Technology Announce Ex Parte Status and Inter-Agency Confidentiality Procedures for Submission in GN Docket No.15-319*, Public Notice, 2016 WL 2942401 (WTB/OET 2016).

⁴ *See* 47 CFR § 1.1206(b)(1).